CONTINUATION OF APPLICATION FOR A SEARCH WARRANT

- 1. I, Amanda E. Becker, am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since 2012. I am currently assigned to the Detroit Field Office, Grand Rapids Resident Agency. During my employment with the FBI, I have conducted investigations involving violations of federal criminal laws, including violations related to child exploitation and pornography. I am familiar with the various statutes of Title 18, United States Code, Chapter 110 – sexual exploitation and other abuse of children, including violations pertaining to sexual exploitation and attempted sexual exploitation of children (18 U.S.C. § 2251(a)), distribution or receipt of child pornography (18 U.S.C.§ 2252A(a)(2)) and possession of child pornography (18 U.S.C. § 2252A(a)(5)(B)). I am also familiar with the various statutes of Title 18, United States Code, Chapter 77, including 18 U.S.C. § 1591, which prohibits the sex trafficking of minors. I am a federal law enforcement officer and, therefore, authorized by the Attorney General to request a Search Warrant under Federal Rule of Criminal Procedure 41.
- 2. The statements contained in this Continuation are based upon information acquired during my investigation, as well as information provided by others such as other police, and Task Force Officers (TFOs) and Special Agents of the FBI. Because this Continuation is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth

only the facts I believe necessary to establish probable cause to believe that there is evidence of criminal activity.

INTRODUCTION AND PURPOSE OF WARRANT

3. I make this continuation in support of an application for a search warrant to extract and review a cell phone belonging to **Terrence Clay** for evidence of sex trafficking of a minor (18 U.S.C. § 1591), sexual exploitation of a minor (18 U.S.C. § 2251(a)), and distribution of child pornography (18 U.S.C. § 2252A(a)(2)(A)). The phone is an Apple iPhone 8 in black case ("the TARGET CELL PHONE"), currently in the custody of the FBI in Grand Rapids, Michigan.

FACTS SUPPORTING PROBABLE CAUSE

- On October 21, 2022, investigators located and interviewed a 16-year-old female,
 ("Victim A"), who was a runaway from Wedgewood youth home in Kentwood,
 Michigan.
- 5. Victim A told investigators that she was being "trafficked" by a male named Terrence Clay. She stated she was at the library to meet men and coordinate the selling of sexual acts to different men. Victim A stated Terrence Clay dropped her off at that location and she was responsible for making \$200 for him throughout the day performing sex acts on different men.
- 6. On October 21, 2022, investigators did a more formal forensic interview of **Victim**A. Victim A told investigators that from the time she had left the Wedgwood group home, she had slept with around 11-12 males and had used a variety of narcotics. Victim A related that one of those males was **Terrence Clay**, and

stated that she had sex with him multiple times. Victim A stated that she was staying with Terrence Clay at various locations in Grand Rapids throughout the time she had been missing from the Wedgwood group home. Victim A stated that Terrence Clay would purchase her clothing and had given her an iPhone that was in her possession when located. Victim A stated that Terrence Clay and one of his friends took nude photographs of her and posted those photographs on different websites promoting sex acts being performed by Victim A. Victim A told investigators that her and Terrence Clay stayed at several hotels in the Grand Rapids area.

- 7. Victim A was able to describe Terrence Clay as a black male with blond dreadlocks. She stated that he was from Atlanta and drove a four-door silver vehicle. Detective Huey was able to locate Terrence Clay as a parolee from Georgia. Detective Huey was also able to find a vehicle being registered to Terrence Clay as a four-door silver Oldsmobile Alero. This vehicle was shown to Victim A from a recent license plate reader and Victim A confirmed this was the vehicle she traveled in with Terrence Clay.
- 8. Victim A had two phones on her person when located, and both were collected as evidence. Victim A gave written consent for investigation of one of the phones and gave the passcode of 692323. That passcode was found to be the Michigan Department of Corrections (MDOC) number for Terrence Clay.
- Investigators contacted MDOC, who found several phone calls that Terrence
 Clay had recently made to MDOC inmates on a recorded line.

- 10. On one of those phone calls **Terrence Clay** spoke to a male who was currently incarcerated. In this phone call labeled on 10/20/2022, **Terrence Clay** talked about buying an iPhone for his "hoe" and her not returning it to him. This is the same night **Victim A** was taken into custody by police. On the phone, **Terrence Clay** stated, "I got hoes selling pussy for me". **Terrence Clay** stated that he still had another "hoe" and he needs to keep them in the hotel room to build their cliental and he has money invested in these "hoes".
- 11. Law enforcement learned Victim A was traveling with Terrence Clay in a silver Oldsmobile Alero and that Terrence Clay may be staying at hotels around Grand Rapids with other women being trafficked. As a ward of the State out of Marquette County, Victim A was transported to the Upper Peninsula to her assigned Foster Care Home in Marquette Co.
- 12. On November 3rd, 2022, law enforcement obtained a search warrant and attached a GPS tracking device to **Terrence Clay**'s Oldsmobile Alero.
- 13. On Saturday November 12th, 2022, law enforcement began monitoring GPS tracking data on **Terrence Clay's** vehicle at 0800 hours. Tracking data showed the vehicle had left Grand Rapids in the late hours of November 11th, 2022, and arrived in Marquette Co., at approximately 0500 hours. At the same time, law enforcement learned that **Victim A** was reported missing from her Foster Care Home. Cheboygan Co. Sheriff located **Terrence Clay's** vehicle on I-75 South, just south of the Mackinaw Bridge. A traffic stop was initiated on **Terrence Clay's**

vehicle; **Terrence Clay** and **Victim A** were the sole occupants of the car. **Terrence Clay** was taken into custody and detained on a parole detainer.

- 14. Investigators found the TARGET CELL PHONE in Clay's car.
- 15. Law enforcement contacted Cheboygan Co. Sheriff Deputy Hutchison. Hutchison reported that Victim A also stated "he [Terrence Clay] knows who I am, he has been sex trafficking me for weeks." Victim A stated Terrence Clay had made her have sex with "a bunch of guys for money." Victim A explained she would stay in hotel rooms, trap houses, and be given cocaine, meth, and heroin while she had sex with males. Victim A stated Terrence Clay would also buy her clothes, shoes, and food. Victim A told law enforcement that Terrence Clay would give her money from time to time. Victim A said Terrence Clay told her that she just needed to make a little bit more money for them so they can take off to Georgia.
- 16. During a forensic interview with Victim A, she stated she noticed Terrence Clay had deleted recent text messages on his phone. She explained that after being picked up by Terrence Clay they stopped at a gas station. While Terrence Clay was out of the car, she accessed his cellphone and looked at his messages. Victim A stated that she noticed that all prior text messages between herself and Terrence Clay from earlier in the day were deleted.
- 17. Investigators previously obtained a warrant from the district court in Kent County to extract and review the contents of the TARGET CELL PHONE.

- 18. During their review, investigators found several images of **Victim A** in which she was unclothed, and her breasts and genitals were exposed. There was also evidence that these pictures were sent to at least two other people from the TARGET CELL PHONE.
- 19. The grand jury indicted **Terrence Clay** for sex trafficking of a minor, sexual exploitation of a minor and distribution of child pornography (1:23-cr-55). Trial in that matter is scheduled before Chief Judge Hala Jarbou on April 29, 2024.
- 20. In preparation for trial, investigators must re-extract the TARGET CELL PHONE because the person who did so initially is unavailable for trial.

CONCLUSION

21. Based on my training and experience, and the training and experience of other law enforcement officers with whom I have conducted investigations or had discussions, I believe there is probable cause to conclude that the extraction and review of the TARGET CELL PHONE will provide evidence of sex trafficking of a minor (18 U.S.C. § 1591), sexual exploitation of a minor (18 U.S.C. § 2251(a)), and distribution of child pornography (18 U.S.C. § 2252A(a)(2)(A)).